

**IDNR – EPA Meeting
December 9, 2014**

Proposed Issues To Be Discussed

1. Next Steps on disputed UAAs
2. Nitrate TMDL Permit Limits – EPA thoughts on IDNR’s “TMDL Discussion for EPA Region VII”
3. Putting Narrative Criteria into permits – Discussion of the Region 5 letter to Ohio
4. Anti-degradation reviews
5. WLAP Concerns
 - a. EPA’s general concern about lack of progress on WLAP revision/adoption – IDNR’s plan/schedule for revision/adoption
 - b. Submittal of WLAP items which require standards approval

Priority WLAP Concerns:

1. E. Coli Decay Rates – Especially in discharges above designated children’s recreation areas
2. Travel Time in E. Coli decay Calculations - Especially in discharges above designated children’s recreation area
3. Inclusion of Short-term E. Coli Limits – required by federal regulation
4. E. Coli Limits for Non-Continuous Dischargers – Limits should be the same as continuous dischargers
5. Total Residual Chlorine Limits – Calculations assume some immediate assimilation with no consequences
6. Use of ½ LC50 for general use streams – not an approved standard
7. Lack of Chronic WET limits – rule changes not being initiated